

Worksheet to Prevent Employee Injury from Student Behavior at K-12 Schools

Purpose: This worksheet is a guide to assist K-12 public schools prevent employee injury caused by student behavior in K-12 schools.¹

Regulation: 454 CMR 25.00 requires employers to provide a place of employment which is free from recognized hazards that have caused or likely to cause serious physical harm to employees. This worksheet is not a regulation and is not a mandatory list. A “No” answer on this worksheet does not mean that a safety violation has occurred. Multiple “Yes” answers across several categories on this worksheet indicate that the employer is using several strategies as a system to prevent employee injury from student behavior.²

	Prevention Strategy	Yes	No	Comments
Written Employee Safety Program (Recommended as part of an effective Safety Management for Employees)				
1	School leadership establishes an expectation that employee injury is not part of the job. (Required by OSHA General Duty Clauses)			
2	A written program is implemented to prevent employee injury caused by student behavior. (Recommended) The written program describes clear responsibilities of superintendent and principals.			
3	School policies are reviewed to ensure they include provisions for the employer to provide a safe workplace for employees.			
Procedures and Work Practices (Required by OSHA General Duty Courses)				
4	There are work practices to maintain employee safety during arrival/dismissal, classroom transitions, hallway movement, lunch and recess.			
5	Safety of school employees, including paraprofessionals and non-teaching staff, is incorporated into all job tasks.			
Classroom Behavior Management (Required by OSHA General Duty Courses)				
6	There are consistent, school-wide classroom management strategies used.			
7	Behavioral support professionals are available to coach teachers and paraprofessionals in behavior management.			
Crisis Procedures (Required by OSHA General Duty Courses)				
8	There are clear detailed procedures for employees to follow when an employee’s safety is threatened.			
9	There is a policy for employees regarding how to handle student-to-student fights. Employees are trained on these procedures.			
10	There is a method for employees to call for help. The method is tested and verified.			
Communication After an Incident (Communication is part of effective Safety Management)				
11	Communication to other employees is provided quickly by management when an employee is injured by a student, so that co-workers can anticipate behaviors and prevent additional employee injury when that student returns to the classroom.			
Student IEP and Relationship to Employee Safety (Recommended as part of effective safety management for employees)				
12	Employees are informed about improvements to procedures, environmental cues, or behavioral support to prevent a repeat incident.			
13	Teachers and paraprofessionals are given the information they need to reduce agitated behavior of students.			
	Note 1: OSHA safety regulations do not have jurisdiction regarding student placement.			

Personal Protective Equipment (PPE) (Required by 29 CFR 1910.132 for Employees)			
14	Sleeves, bite-resistant arm guards, sleeve cushions, gloves, or other equipment are provided to protect employees from scratches or bites when caring for students with this behavior.) (OSHA 29 CFR 1910 132(a))		
15	Closed toe shoes are required for employees who work with a student who has a history throwing objects or kicking. (OSHA 29 CFR 1910 132(a))		
16	PPE is kept in clean and sanitary condition. (OSHA 29 CFR 1910 132(a))		
Employee Injury Reporting and Tracking (Required by 29 CFR 1904 for Employees)			
17	Physical injury and threats against employees are tracked. This includes incidents that only require first-aid in addition to injuries that require medical attention or lost time.		
18	Employees are not blamed for their injury. Each incident is evaluated for the root cause contributing to the behavior, such as the student’s activities preceding the incident, the current task being performed, and environmental cues.		
19	When an individual student causes multiple incidents against employees, a team re-evaluates the underlying factors to develop additional strategies to prevent employee injury.		
	Note 2: K-12 schools are exempt from maintaining an <i>OSHA 300 Log</i> . Schools are required to notify DLS of work-related hospitalization, amputation, loss of eye or fatality and respond to BLS surveys. (OSHA 29 CFR 1904.2)		
Employee Training (Training is required by OSHA General Duty Clause)			
20	Different types of training are provided, such as child development, classroom management strategies, behavior supports, and types of disabilities. - Employees are trained on general behavior management and de-escalation techniques - Employees are trained in specific behavior management and de-escalation techniques for the specific students they work with.		
21	Staff are trained in restraint policies. If authorized to perform restraints, staff skill is evaluated, and skills are practiced.		
22	The district and school have an outline of what types of behavior management training are provided to employees, and specifies what training is required for each job title.		
23	Employees hired mid-year receive the required training. Training is particularly important for paraprofessionals.		
24	Refresher training is provided. There is ongoing professional development provided with the intent of preventing employee injury.		

Labor-Management Safety Committee (Recommend as effective Safety Management for employees)			
25	The district has a safety committee that contains representatives from teaching, paraprofessional, non-teaching staff and management.		
26	The safety committee reviews injury patterns, effectiveness of current procedures and training, and recommends preventive measures.		
Annual Program Review (Recommend as effective Safety Management for employees)			
27	The district and safety committee perform an annual review of the strategies implemented to prevent employee injury from student behavior.		

References

1. Aisha H. Spencer and Ryan P. Farrell, "Putting violence in perspective: how safe are America's educators in the workplace?," *Monthly Labor Review*, U.S. Bureau of Labor Statistics, August 2016, <https://doi.org/10.21916/mlr.2016.37>
2. OSHA General Duty Clause: OSHA does not have a regulation for the prevention of employee injury from student behavior. The *Massachusetts State Plan* can issue a General Duty Clause violation when an employer has not taken any steps to prevent an injury from a recognized hazard. This worksheet contains feasible strategies. Implementation of each item on this worksheet is not required. The employer can also develop their own strategies that are not on this worksheet.
3. **OSHA Directive.** "Enforcement Procedures for Occupational Exposure to Workplace Violence" CPL 02-01-058 (01/10/2017). [osha.gov/sites/default/files/enforcement/directives/CPL_02-01-058.pdf](https://www.osha.gov/sites/default/files/enforcement/directives/CPL_02-01-058.pdf)

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